

RECEIVED  
JUL 2 2001  
FCC MAIL ROOM



DOCKET FILE COPY ORIGINAL

RONALD L. LANIER  
DIRECTOR

**COMMONWEALTH of VIRGINIA**  
*Department for the Deaf and Hard of Hearing*

(804)662-9502 VOICE/TTY  
TOLL FREE 1-800-552-7917  
VOICE/TTY  
(804)662-9718 FAX

RATCLIFFE BUILDING, SUITE 203  
1602 ROLLING HILLS DRIVE  
RICHMOND, VIRGINIA 23229-5012

June 28, 2001

**CC DOCKET #98-67**

**VIRGINIA RELAY  
ANNUAL SUMMARY OF CONSUMER COMPLAINTS  
CONCERNING TRS SERVICES**

As required in the Federal Communication Commission's March 6, 2000 Improved TRS Order, the Virginia Department for the Deaf and Hard of Hearing (VDDHH) is submitting our Annual Log Summary of Consumer Complaints Concerning Telecommunications Relay Services. Our submission includes complaints for the period June 29, 2000 through May 31, 2001. Our narrative is accompanied by a complaint digest and spreadsheet summary of consumer feedback alleging violation of federal minimum TRS standards. These additional documents were prepared for VDDHH by AT&T, the Commonwealth's contracted relay provider.

Virginia Relay users can provide comments directly to AT&T or through VDDHH in a number of ways. AT&T receives consumer comments from the Communication Assistant (CA), the relay center support desk, the AT&T Accessible Communication Services (ACS) toll-free number, the AT&T national website, or in writing. VDDHH receives comments from our toll-free Customer Service number, the Consumer Input Form found on the VDDHH homepage, the agency e-mail address, consumer forums, contracted outreach staff, or in writing. All comments from the consumers of Virginia Relay are recorded in AT&T's automated Commendation Inquiry and Complaint System, more commonly referred to as CICS.

Comments must be entered into the CICS database within twenty-four hours of receipt, whether received by AT&T directly or through VDDHH. AT&T is then required to forward VDDHH an electronic copy of each entry within the ensuing twenty-four hour period. The relay center support desk responds to the majority of comments. For complaints received directly by VDDHH, a copy of the consumer comments is forwarded to AT&T for CICS entry. VDDHH also provides the response to the consumer in these cases. For complaints directly related to CA performance, the center manager meets with the individual CA within seventy-two hours of receipt. Complaints or inquiries related to

No. of Copies rec'd 014  
List A B C D E

technical or billing issues are not subject to a specific deadline since research or follow-up with other entities may be necessary. However, timely resolution of these items is still required by VDDHH. The Virginia State Corporation Commission is available to assist VDDHH with billing issues related to local phone companies under their jurisdiction.

Copies of all CICS entries are maintained by VDDHH and reconciled to the monthly CICS report provided by AT&T. Staff immediately investigates any complaints not indicating resolution during the month. Since June of 2000, any CICS entry related to an alleged violation of FCC TRS standards or of Virginia contract requirements is pulled and filed separately. This allows for a clear accounting of specific complaints related to FCC or state contract requirements. Remaining CICS entries and monthly reports are retained for a period of five years.

For the current FCC reporting period, 458 customer comments were received and reported by CICS. Of these comments, 18 complaints, or approximately four percent (4%) of the feedback were alleged violations of the federal minimum standards. Of these 18 complaints, three (3) addressed typing issues, three (3) addressed a conversation that was not relayed verbatim, one (1) was related to the use of Relief CAs, and the remaining eleven addressed average speed of answer (ASA). Nine (9) of these complaints were resolved with the consumer on the same day as the complaint was received. Eight (8) complaints were resolved through follow-up with the consumer in an average of eight (8) days. The remaining complaint, concerning the use of relief CAs, was closed after 30 days of unsuccessful attempts to contact the consumer by phone or written correspondence.

Upon review of the daily call volume reports for the dates the eleven consumer ASA complaints occurred, the minimum requirement for 85% of the calls to be answered in ten (10) seconds was indeed met. However, there were two (2) days identified during the current reporting period when Virginia's in-state center did not meet the 85% requirement. On February 22, 2001, 74% of the calls were answered in ten (10) seconds; on April 16, 2001, 84% of the calls were answered in ten (10) seconds. On both dates, the state experienced unexpected severe weather conditions and, as a result, unusually high call volumes. Although no consumer complaints were filed in response to the longer answer response rate on these dates, VDDHH now includes language in our contract to prevent this situation from recurring. This language allows the contractor to transfer a portion of Virginia's relay traffic to other AT&T relay centers in the event of "...unexpected high relay traffic due to severe weather conditions, national disasters, acts of God, or other unavoidable causes not attributed to the contractor's fault or negligence..."

VDDHH believes that the current use of the AT&T CICS reporting system provides a satisfactory mechanism for receipt of, response to, and resolution of all consumer contacts concerning Virginia Relay. We continue to encourage consumer feedback on our state's relay service through statewide Relay Forums, Town Hall meetings, the use of

the Commonwealth Poll, and the development of on-line submission of our Consumer Input Form. In addition, during the months of May and June 2001, VDDHH contracted with an independent organization to conduct a formal Quality Assurance Testing program of our relay service. Preliminary results of this recent Quality Assurance Testing program reveal Virginia Relay consistently exceeds the FCC minimum standards for TRS. We plan to meet with AT&T in the coming months to discuss the results of this new program and identify training concerns and resolve possible technical issues. The program will also give us a baseline for future evaluations to measure our progress and improvements in service quality.

On behalf of the users of Virginia Relay, VDDHH appreciates the FCC's commitment to improving the telecommunications industry standard for relay services. Any questions regarding this submission should be addressed to Clayton E. Bowen, VDDHH Business Manager, 1602 Rolling Hills Drive, Suite 203, Richmond, VA 23229-5012; e-mail address [bowence@ddhh.state.va.us](mailto:bowence@ddhh.state.va.us) .

## **VIRGINIA RELAY SERVICE**

### **COMPLAINTS**

#### **Descriptions of Complaints**

##### **TTY June 29, 2000**

The customer said that the CA typed terribly during his/her call.

**Escalation:** Received by the Virginia Relay Center, and handled by the National Customer Care Center.

**Resolution:** Apologized to the customer for any inconvenience and thanked them for letting us know.

**Contact Closed:** July 04, 2000

##### **TTY June 29, 2000**

The customer complained about the long wait to reach a CA to place his call.

**Escalation:** Received by the Virginia Relay Center, and handled by the resource manager.

**Resolution:** Apologized for the inconvenience.

**Contact Closed:** July 24, 2000

#### **July 2000-NOTHING TO REPORT**

#### **August 2000-NOTHING TO REPORT**

##### **V September 23, 2000**

The customer complained about the number of times his call was transferred.

**Escalation:** Received via the Virginia Relay Center, and referred to the Virginia Relay Center manager.

**Resolution:** Made several unsuccessful attempts to reach the customer.

**Contact Closed:** October 23, 2000

##### **TTY October 13, 2000**

The customer complained that the CA needed to brush up on his/her typing skills.

**Escalation:** Received by the Virginia Relay Center, and handled by the Resource Manager.

**Resolution:** Apologized for the inconvenience.

**Contact Closed:** October 16, 2000

## **VIRGINIA RELAY SERVICE**

### **TTY October 18, 2000**

The customer complained he/she had difficulty reaching the relay service.

**Escalation:** Received by the Virginia Relay Center, and handled by the National Customer Care Center.

**Resolution:** Apologized for the inconvenience, and assured the customer we would document his complaint.

**Contact Closed:** October 24, 2000

### **TTY October 23, 2000**

The customer complained the CA had not relayed the call verbatim.

**Escalation:** Received and handled by the Virginia Relay Center.

**Resolution:** Apologized for the inconvenience, and assured the customer that we would document the complaint.

**Contact Closed:** October 23, 2000

**November 2000-NOTHING TO REPORT**

**December 2000-NOTHING TO REPORT**

### **V January 3, 2001**

The customer complained he/she had to wait a long time to reach a CA when calling the National Speech-to-Speech service.

**Escalation:** Received via the Relay Customer Service line, and handled by the National Customer Care Center.

**Resolution:** Documented for reporting purposes.

**Contact Closed:** January 8, 2001

### **TTY January 8, 2001**

The customer complained he had to wait a long time to reach a CA.

**Escalation:** Received by the Virginia Relay Center, and handled by the National Customer Care Center.

**Resolution:** Apologized and assured the customer a report would be filed.

**Contact Closed:** January 9, 2001

### **TTY January 12, 2001**

The customer complained he had to wait a long time to reach a CA.

**Escalation:** Received and handled by the Virginia Relay Center.

**Resolution:** Apologized for the inconvenience.

**Contact Closed:** January 12, 2001

## **VIRGINIA RELAY SERVICE**

### **TTY January 29, 2001**

The customer complained he/she had difficulty reaching the relay service.

**Escalation:** Received and handled by the Virginia Relay Center.

**Resolution:** Apologized for the inconvenience.

**Contact Closed:** January 29, 2001

### **TTY February 7, 2001**

The customer complained he was unable to reach the Virginia Relay Service.

**Escalation:** Received by the Virginia Relay Center, and handled by the National Customer Care Center.

**Resolution:** Apologized for the inconvenience. Advised the customer we didn't have any reports of problems, but had documented the information. Thanked him for bringing it to our attention.

**Contact Closed:** February 12, 2001

### **TTY February 27, 2001**

The customer complained he/she had to wait a long time to reach a CA.

**Escalation:** Received and handled by the Virginia Relay Center.

**Resolution:** Apologized for the inconvenience.

**Contact Closed:** February 27, 2001

### **TTY March 14, 2001**

The customer complained he had to wait a long time to reach a CA.

**Category:** Equipment – Answer/Wait Time

**Escalation:** Received by the Virginia Department for the Deaf and Hard of Hearing, and handled by the National Customer Care Center.

**Resolution:** Apologized for any inconvenience, and explained that we do comply with FCC answer performance requirements.

**Contact Closed:** March 23, 2001

### **TTY March 14, 2001**

The customer complained the CA had not relayed the call verbatim.

**Category:** CA/OPR Related – Other

**Escalation:** Received by the Virginia Department for the Deaf and Hard of Hearing, and handled by the National Customer Care Center.

**Resolution:** Apologized for the inconvenience, and thanked her for bringing it to our attention.

**Contact Closed:** March 19, 2001

## VIRGINIA RELAY SERVICE

### **TTY March 14, 2001**

The customer complained about the CA's typing.

**Category:** CA/OPR Related – Typing Skill/Speed

**Escalation:** Received by the Virginia Department of the Deaf and Hard of Hearing, and handled by the National Customer Care Center.

**Resolution:** Documented for reporting purposes.

**Contact Closed:** March 14, 2001

### **TTY April 2, 2001**

The customer complained he/she had to wait a long time to reach a CA.

**Category:** Equipment – Answer/Wait Time

**Escalation:** Received and handled by the Virginia Relay Center.

**Resolution:** Apologized for the inconvenience.

**Contact Closed:** April 2, 2001

### **TTY April 7, 2001**

The customer complained the CA was slow to respond.

**Category:** CA/OPR Related – Other

**Escalation:** Received and handled by the Virginia Relay Center.

**Resolution:** Apologized for the inconvenience, and assured the customer the CA's manager would follow up accordingly.

**Contact Closed:** April 7, 2001

### **TTY May 14, 2001**

The customer complained the CA had not relayed the call verbatim.

**Category:** CA/OPR Related – Other

**Escalation:** Received and handled by the Virginia Relay Center.

**Resolution:** Apologized for the inconvenience, and assured the customer a report would be filed.

**Contact Closed:** May 14, 2001

AT&T RELAY SERVICES  
ANNUAL SUMMARY OF CONSUMER COMPLAINTS  
JUNE 29, 2000 THROUGH MAY 31, 2001

Virginia	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
VOICE	0	0	0	1	0	0	0	1	0	0	0	0	2
TTY	2	0	0	0	3	0	0	3	2	3	2	1	16
TOTAL	2	0	0	1	3	0	0	4	2	3	2	1	18